



*Hercules Incorporated  
(Aqualon Division)  
1111 Hercules Road  
Hopewell, Virginia 23860*

## ***FACT SHEET DECEMBER 2008***

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### ***Introduction***

The Hercules Incorporated – Aqualon Division (Hercules) facility in Hopewell, Virginia had historically coordinated with the Commonwealth of Virginia's Voluntary Remediation Program (VRP) to investigate and remediate various portions of the site property. In November 2008, Ashland Incorporated purchased Hercules Incorporated. Hercules Incorporated (now part of Ashland) retains ownership and operation of the site as Ashland Aqualon Functional Ingredients. Several areas were investigated and/or remediated under the authority of the Virginia Department of Environmental Quality (DEQ). In December 1999, the Environmental Protection Agency Region III (EPA) invited Hercules to participate in its Corrective Action program through a Facility Lead Agreement (FLA). This fact sheet provides interested citizens with updated information on the environmental investigations and related activities taking place at the Hercules facility under the FLA.

### ***History***

The Hercules facility is located in the eastern part of the City of Hopewell off Winston Churchill Drive near Route 10. The facility property encompasses approximately 390 acres, of which about two-thirds have been developed. As facility operations have changed over the years, wildlife projects have restored or enhanced habitat on approximately 160 acres. In 1926, Hercules purchased and began operation of a cotton cellulose purification plant on the property, which has since been closed and demolished. The manufacture of cellulose derivatives began during the late 1930's, and has continued until the present day.

Currently, approximately 270 employees operate manufacturing process areas 24 hours per day,

365 days per year to primarily produce dried, packaged cellulose derivatives. These derivatives are used primarily as water-based thickeners by other manufacturers who produce foods, cosmetics, paper, and a variety of "everyday" products.

### ***Facility Lead Corrective Action Agreement***

On February 4, 2000, Hercules entered into a Voluntary Facility Lead Corrective Action Agreement with EPA. The Agreement requires Hercules to identify, prevent, or mitigate unacceptable threats to human health and the environment from any releases of hazardous wastes or hazardous waste constituents. The documents required by the Agreement include Work Plans defining the scope of investigations at the facility, the Community Relations Plan describing public involvement activities, and the Environmental Indicators Assessment which broadly indicates the current state of environmental conditions with respect to human health and groundwater quality.

To develop its initial Work Plan, Hercules evaluated prior assessments of potential environmental releases on the site property, and identified and prioritized a total of 34 solid waste management units (SWMUs). The majority of the SWMUs were determined to pose no significant risk to the environment and were recommended for No Further Action. The October 2001 Work Plan contained the following recommendations:

- No Further Action (NFA) for 24 SWMUs for which no significant risk to human health or the environment was expected. Three (3) of these SWMUs had been previously remediated under DEQ supervision.
- Further investigative efforts for ten (10) SWMUs in which nonhazardous solid waste

had been managed and from which releases to the environment were suspected or known.

During December 2001 and November 2002, Hercules conducted two major investigations (Phases I and II) under EPA-approved work plans to evaluate potential environmental impacts from the identified SWMUs. In June 2002, Hercules also developed a Hydrogeologic Evaluation in order to evaluate the groundwater/surface water flow interaction on the facility property, and to site nine new groundwater-monitoring wells.

Based on the results of these investigations, Hercules prepared and submitted the required documentation for the two Environmental Indicators (EIs): *Current Human Exposures Under Control* and *Migration of Contaminated Groundwater Under Control*. In September 2004, EPA agreed with Hercules that the requirements for the two EIs had been met.

In September 2005, Hercules submitted a RCRA Facility Investigation (RFI) Report assessing the previous investigative work performed under the FLA, and recommending a path forward for each of the investigated SWMUs. EPA provided comments on the RFI Report in August 2006, and a progress meeting was held at the Hopewell facility in September 2006. The progress meeting included:

- Site reconnaissance of the current conditions of the subject SWMUs;
- Development of the path forward for the next phase of investigative work under the FLA; and
- Discussion of future components of the project environmental evaluations, including a request for an initial evaluation of ecological habitat.

In February, May, and June 2007, Hercules conducted a Phase III investigation under an EPA approved Sampling and Analysis Plan (SAP). The Phase III SAP specifically outlined the environmental sampling at the identified SWMUs as well as the installation of four new groundwater monitoring wells, site-wide sampling of the groundwater monitoring well network, and confirmatory PCB sampling. In addition, an Ecological Evaluation (EE) was performed along with the collection of samples from ecological habitat in support of a Screening Level Ecological Risk Assessment (SLERA).

In November 2007, Hercules submitted a Phase III Site Investigation Summary Report (along with response to EPA's comments on the RFI Report), assessing the Phase III investigative work performed under the FLA, and recommending a path forward for each of the investigated SWMUs. The Phase III Site Investigation Summary Report was reviewed by EPA and comments were received by Hercules in May 2008.

In October 2008, Hercules met with EPA in order to present and discuss responses to the EPA's comments on the Phase III SISR. At the meeting, it was mutually agreed upon that Hercules would move forward with the human health and ecological risk assessments for the facility. In December 2008, Hercules submitted the Final Response to Comments on the Phase III SISR which provided formal responses to the EPA's comments as well as additional information requested by the EPA at the meeting in October.

Hercules continues to work with EPA and DEQ to complete the assessment of the ten (10) remaining SWMUs in preparation for the facility's eventual exit from the Corrective Action Program.

#### **Contact Information**

For further information regarding the Corrective Action activities or the Information Repository maintained by Hercules, contact Mr. Steve Spence at (804) 541-4506. Information is also available at [www.epa.gov/reg3wcmd/ca/ca\\_facilities.htm](http://www.epa.gov/reg3wcmd/ca/ca_facilities.htm).

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#### **Environmental Indicators**

*Current Human Exposures Under Control*  
*Migration of Contaminated Groundwater Under Control*

**Approved in September 2004**